

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ELAINE M. DECOULOS,

Plaintiff,

v.

BRUNO LIONEL SCHRODER, SUZANNE
MALTZAHN, ASSOCIATED NEWSPAPERS
LTD., SOLO SYNDICATION, LTD., THE
SCOTSMAN PUBLICATIONS, LTD., CENGAGE
LEARNING, INC., THE GALE GROUP, INC.,
HIGHBEAM RESEARCH, INC.,

Defendants.

Civil Action

No. 1:11-cv-10972-DPW

DECLARATION OF SHARON WEINSTOCK

1. I am currently employed by Cengage Learning, Inc. ("Cengage") as a Vice President, a position I have held since September, 2007. I additionally act as an Assistant General Counsel in Cengage's legal department and in that position I am aware of certain legal matters as to Cengage, its sister corporation The Gale Group, Inc. ("Gale") and Gale's product HighBeam Research.

2. I make this declaration in support of Cengage's and Gale's motion in opposition to plaintiff's request for entry of default and motion for relief from the November 16, 2012 order in the above-referenced action.¹ The facts stated herein are stated upon information and belief.

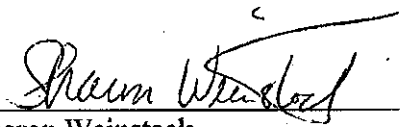
3. Cengage's legal department first became aware of attempted service on Cengage and Gale in this action on November 13, 2012. Cengage and Gale then immediately

¹ As stated by my colleague, C. Luke Brussel, in his previous declaration in this action, Dkt. No. 85, ¶ 2, the references are only to Cengage and Gale because "HighBeam Research, Inc." is not a legal entity.

took steps to assess the claims against Cengage and Gale, including advising their New York counsel and engaging local counsel, and the following week filed a motion to dismiss those claims.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: January 23, 2013


Sharon Weinstock
Vice President

CERTIFICATE OF SERVICE

I, John (Jed) DeWick, Esq., hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on this 23rd day of January 2013.

/s/ John DeWick
John (Jed) DeWick, Esq.